

EXHIBIT B

From: Bender, Kristin
To: mitra@ahouraianlaw.com; Summer Benson; Stacey Ashby; Amit Shertzer; Vaneta Birtha; Miles Cooley; Cortni Davis; Bryan Freedman; Jose Perez; Jason Sunshine; Ellyn Garofalo; Amir Kaltgrad; Rose Khatchikian; Theresa Troupson
Cc: Gottlieb, Michael; Hudson, Esra; Roeser, Stephanie; Bruno, Matthew; Governski, Meryl Conant; Nathan, Aaron E.; Connolly, Michaela; Taustine, Melissa; Climaco, Katelyn
Subject: RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL, No. 1:25-cv-00449-LJL
Date: Monday, June 9, 2025 5:21:31 PM

Counsel,

We have yet to receive any response to the email below, which we sent more than two weeks ago. To date you have made three small productions, none of which includes any materials that you received from third parties, including in connection with the decision to withdraw the Venable and Swift subpoenas. We can only conclude that no such materials exist and that the purpose of subpoenaing Venable and Swift was not to procure any relevant discovery but rather to generate a public relations stunt. Either way, given that Mr. Freedman has publicly confirmed that the Wayfarer parties “dropped the request for the subpoena” because “they got exactly what they were seeking[,]” we understand that you will withdraw RFPs 108-109 that you served on Ms. Lively and RFPs 106-107 that you served on Mr. Reynolds (to the extent they still are operative considering he is no longer a party—Mr. Reynolds reserves all rights on that regard).

To the extent that you do not intend to withdraw those RFPs, please provide your availability to confer within 48 hours.

Regards,
Kristin

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From: Bender, Kristin <KBender@willkie.com>
Sent: Thursday, May 22, 2025 4:57 PM
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Subject: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL, No. 1:25-cv-00449-LJL

Counsel,

At least one public report relating to the Wayfarer Parties' withdrawal of the Venable and Swift Subpoenas has stated that "Bryan Freedman dropped the request for the subpoena and the reason for doing this is very simple, they got exactly what they were seeking." We interpret this quote to mean either that (1) the intent of the Wayfarer Parties' subpoena, since our understanding is that they obtained no discoverable materials as part of this process, was to introduce scandalous allegations about Ms. Lively and her counsel into the public domain to generate negative stories, or (2) the Wayfarer Parties have received materials responsive to their subpoena, which would come as a surprise given that no materials have been provided to us.

To the extent that the Wayfarer Parties or their counsel have obtained any documents or communications concerning Ms. Lively from any third party, those materials must be produced as they are responsive to multiple long-ago served Requests for Production ("RFP(s)'), including RFP 32 which demands "***All Documents and Communications concerning Ms. Lively that You obtained from any third party.***" Given that you have indicated that you plan to begin to produce documents ***this week***, we expect that any materials that you received from third parties, including in connection with the decision to withdraw the Venable and Swift subpoenas, will be included in the initial production. We trust that you will continue to bear in mind, as well, the continuing obligations in relation to discovery material as to parties and third parties under the applicable Protective Order.

Our clients reserve all rights.

-Kristin

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